

**IN THE UNITED STATES DISTRICT COURT NORTHERN  
DISTRICT OF ILLINOIS, EASTERN DIVISION**

COMBINED SELECTION GROUP, LTD.

Plaintiff,

V.

IFS NORTH AMERICA, INC.,

Defendant.

Case No. 23-cv-02312

Magistrate Judge Gabriel A. Fuentes

## JOINT REPORT OF PROGRESS IN SETTLEMENT DISCUSSIONS

This Report is submitted by the parties in compliance with the Court’s direction to provide a report as to the progress of the settlement discussions.

The parties inform the Court that:

- 1) Both the Plaintiff and the Defendant have engaged in thoughtful and diligent efforts to settle this matter. In the wake of those efforts the parties believe that they are indeed close to, but unable to reach, an agreement that will resolve this matter. The unresolved efforts that remain and at which the parties are at an impasse consist primarily of the perceived need for security of the performance of the obligations of both parties under the proposed settlement agreement and the timing of the payment for the performance those services. . Despite the mutual efforts of the undersigned, the parties have been unable to break though the impasse preventing their mutual agreement.
- 2) In light of that impasse both parties are respectfully requesting that the Court, the parties and their respective counsel join in a final zoom meeting. The purpose of the meeting will be for the parties to air and explain their remaining differences and seek the significant and able guidance of the Court in coming to a possible resolution. Both

parties are, therefore, requesting that, if so inclined, the Court provide the next available dates and times at which this final attempt at settlement can be approached by both parties diligently and in good faith.

- 3) In any event, should those efforts, however warranted, be unsuccessful, the parties mutually inform the Court that discovery has been completed and that a schedule for the presentation of dispositive motions in advance of trial can be set by the Court.

Respectfully submitted,

COMBINED SELECTION  
GROUP, LTD.

/s/ Thomas J. Dillon

One of the attorneys for the Plaintiff,  
COMBINED SELECTION GROUP LTD.

Thomas J. Dillon (ARDC #3124223)  
Kyle T. Dillon (ARDC #6323818)  
MCFADDEN & DILLON, P.C.  
120 South LaSalle Street, Suite 1920  
Chicago, Illinois 60603  
(312) 201-8300  
[t.dillon@mcdillaw.com](mailto:t.dillon@mcdillaw.com)

IFS NORTH AMERICA, INC.

/s/ David A. Eisenberg

One of the attorneys for Defendant, IFS  
NORTH AMERICA, INC.

David A. Eisenberg, Esq.  
LOFTUS & EISENBERG, LTD.  
161 N. Clark, Suite 1600  
Chicago, Illinois 60601  
T: 312.899.6625  
[david@loftusandeisenberg.com](mailto:david@loftusandeisenberg.com)